

Exhibit 26

EXHIBIT C

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

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CHRISTINA G. PRUDENCIO,

Plaintiff,

vs.

No. RG20061303

JOHNSON & JOHNSON, et

al.,

Defendants.

_____/

VIDEOTAPED VIRTUAL ZOOM DEPOSITION OF

SUSAN NICHOLSON, M.D.,

(COR/PMQ Johnson & Johnson and Johnson & Johnson
Consumer Inc.)

VOLUME V, Pages 684 - 902

June 4, 2021

Taken before EARLY K. LANGLEY

RMR, RSA, B.A.

CSR No. 3537

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1 don't have access to care, and we've been creating
2 new ways to deliver care to women and make sure
3 that they're getting the benefit of the health
4 care that we know will give them a safe and, you
5 know, hopefully their chosen experience through 09:19
6 childbirth.

7 So it's a little bit -- it's complicated
8 because we work with a lot of different people,
9 but our job is to bring the science and the
10 medicine in the best possible way. 09:19

11 MR. SATTERLEY: Move to strike. Beyond
12 the scope of the notice.

13 BY MS. BROWN:

14 Q. Would you tell us, Dr. Nicholson, what
15 position did you hold at Johnson & Johnson prior 09:19
16 to the vice president of women's health?

17 A. So prior to my current role, I was the
18 head of consumer medical safety. My title was
19 vice president of safety, surveillance, and risk
20 management. It's a bit of a mouthful, but 09:20
21 basically, the chief safety officer for our
22 consumer group responsible for the oversight --
23 medical oversight of all of the consumer products
24 that we make around the world.

25 Q. And would that include, Dr. Nicholson, 09:20

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1 Johnson's Baby Powder?

2 A. Yes. Absolutely.

3 Q. Can you tell us a little bit about what

4 your role was as it related to Johnson's Baby

5 Powder when you were the head of consumer medical 09:20

6 safety.

7 A. So I led a team of doctors. Depending on

8 when it was, it was somewhere between, you know,

9 let's say 22 and 30 individuals, physicians,

10 nurses, pharmacists. And our role as a group was 09:20

11 to provide the medical expertise to evaluate any

12 emerging safety concerns for any product we make

13 around the world.

14 My job really was to make sure we were

15 making the right decisions and being very 09:21

16 science-based and keeping the consumers, the

17 people who use our products, at the absolute

18 forefront of our decision-making, so safety first.

19 And in some instances, I -- you know, in

20 many instances, I dug into the data myself and 09:21

21 studied the issues because I wanted to be sure

22 that I understood what was at play and making sure

23 that we made the right decision.

24 Q. Now, Dr. Nicholson, we're here in your

25 deposition as a corporate representative or as a 09:21

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